

MEMO ENDORSEDUSDC SDNY
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DATE FILED: 05/12/2022**Federal Defenders
OF NEW YORK, INC.**Southern District
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May 12, 2022

BY ECFThe Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007**Re: United States v. Hugo Mendoza
21 Cr. 273 (VEC)**

Dear Judge Caproni:

I write, as counsel to Hugo Mendoza in the above-captioned matter, to respectfully request that the Court modify Mr. Mendoza's pretrial conditions of release to include travel to the District of New Jersey. Pretrial services consents to this modification and the government does not object. In the alternative, Mr. Mendoza respectfully requests a temporary bail modification to permit him to travel to the District of New Jersey on May 23, 2022 to celebrate his birthday with his children.

On January 28, 2021, Mr. Mendoza was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; pre-trial services supervision as directed; surrender of travel documents with no new applications and travel restricted to the Southern and Eastern Districts of New York; drug testing and treatment as directed by pretrial services; refrain from possession of controlled substances unless otherwise prescribed by a licensed physician; home detention with location monitoring; may only work at a job with a specified location and approved by pretrial services, consistent with home detention.

On May 4, 2021, the Court granted Mr. Mendoza's first bail modification request to permit pretrial services discretion to set an exercise schedule for Mr. Mendoza to enable him to go outside for routine exercise for at least 1.5 hours a day, 3 times a week, as recommended by his doctor.

On June 24, 2021, the Court granted Mr. Mendoza's application to modify his bail conditions following an electrical fire in his home that destroyed his family's entire house. With the consent of pretrial services and the Government, the Court agreed to replace Mr. Mendoza's condition of home detention with a curfew to be set by pretrial services. On December 3, 2021, the Court granted Mr. Mendoza permission to travel between his home in New York and the District of New Jersey for the holidays, returning home each day by the curfew set by pretrial services. In early March 2022, the Court granted Mr. Mendoza permission to travel on March 6, 2022 from his home in New York to the District of New Jersey to celebrate his daughter's birthday.

Mr. Mendoza now seeks a permanent bail modification to include permission to travel to the District of New Jersey, a modification suggested by pretrial services given that Mr. Mendoza's children reside in New Jersey. The Government does not object to this request. In the alternative, Mr. Mendoza respectfully requests a temporary bail modification to permit him to travel to the District of New Jersey on May 23, 2022 to celebrate his birthday with his children.

Thank you for your consideration of this request.

Respectfully submitted,

/s/
Marne Lenox
Assistant Federal Defender
(212) 417-8721

Application GRANTED.

Mr. Mendoza's bail conditions are hereby modified to include permission to travel to the District of New Jersey.

SO ORDERED.



Date: May 12, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

cc: Ni Qian, Assistant U.S. Attorney
Ashley Cosme, Pretrial Services Officer